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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

(21 U.S.C. §§ 952(a) and 960)

ANSIL EUGENE SENNON,

- against -

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

TAMIKA COMRIE, being duly sworn, deposes and states that she is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about July 16, 2012, within the Eastern District of New York and elsewhere, defendant ANSIL EUGENE SENNON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:1

- 1. On or about July 16, 2012, the defendant ANSIL EUGENE SENNON arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Carribean Airlines Flight 500 from Trinidad.
- 2. The defendant ANSIL EUGENE SENNON was selected for a Customs and Border Protection ("CBP") examination. First, his luggage was searched. During that inspection, a CBP officer conducted a pat-down examination of the defendant and discovered a hard object in the defendant's groin area. The officer asked the defendant to remove the object, which he did, revealing leather underwear. Further probing of the leather underwear revealed a white, powdery substance that field-tested positive for cocaine. The defendant ANSIL EUGENE SENNON was then placed under arrest. He then admitted, in sum and substance, that he was to be paid to transport illegal drugs into the United States.
- 3. The total approximate gross weight of the cocaine found in the defendant ANSIL EUGENE SENNON's underwear is 1,446.9 grams.

Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant ANSIL EUGENE SENNON be dealt with according to law.

Tamike Comrie Special Agent

Homeland Security Investigations

Sworn to before me this 16th day of July, 2012

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